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November 24, 2021

VIA ECF

Hon. Judge Robert M. Levy, U.S.M.J.
U.S. District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
(718) 613-2170

Re: *Gov. Employees Insur. Co. v. Zilberman et al.*, No. 1:20-cv-00209-FB-RML

Your Honor,

We represent non-party, Marina Yakubovsky, Trustee of The Daniel Z Irrevocable Living Trust (the “Trust”) in the above-referenced action. The Trust filed a motion to quash Plaintiffs’ subpoena on November 22, 2021 [**Dkt. 73**], to which Plaintiffs filed opposition on November 24, 2021 [**Dkt 76**]. We write to request a court conference, or oral argument, at the Court’s earliest convenience.

In their Opposition, Plaintiffs argued a basis for relevance that was not disclosed during the meet and confer between the parties on this motion. The Trust seeks argument to respond to Plaintiffs’ arguments prior to a decision on the Trusts’ motion.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Oleg A. Mestechkin
Oleg A. Mestechkin, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2021, I served the foregoing document via electronic filing with the Clerk of the Court using the CM/ECF filing system.

/s/ Nancy Lam

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*Attorneys for Non-Parties The Daniel Z
Irrevocable Living Trust and Marina Yakubovsky,
Trustee of The Daniel Z Irrevocable Living Trust,
for the purpose of Motion to Quash*